William L. Mentlik
Roy H. Wepner
Stephen F. Roth
Aaron S. Eckenthal
LERNER, DAVID, LITTENBERG,
  KRUMHOLZ & MENTLIK, LLP
600 South Avenue West
Westfield, NJ 07090-1497
Tel: 908.654.5000
Fax: 908.654.7866
Attorneys for Defendant Dr. Reddy's Laboratories, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ASTRAZENECA AB, AKTIEBOLAGET HÄSSLE, ASTRAZENECA LP, KBI INC. and KBI-E INC.,	: : :	**Document Filed Electronically**
	:	Civil Action No. 05-5553
Plaintiffs,	:	
v.	: :	Mary L. Cooper, U.S.D.J. Tonianne J. Bongiovanni, U.S.M.J.
DR. REDDY'S LABORATORIES, LTD. and DR. REDDY'S LABORATORIES, INC.,	: : :	
Defendants.	: x	
DR. REDDY'S LABORATORIES, LTD. and DR. REDDY'S LABORATORIES, INC.,	: :	Civil Action No. 08-2496
	:	
Counterclaim Plaintiffs,	:	Mary L. Cooper, U.S.D.J.
v.	: :	Tonianne J. Bongiovanni, U.S.M.J.
ASTRAZENECA AB, AKTIEBOLAGET HÄSSLE, ASTRAZENECA LP, KBI INC. and KBI-E INC.,	: : : :	
Counterclaim Defendants,	:	
and	: :	
MERCK & CO., INC.,	: :	
Third Party Defendant.	: x	

DR. REDDY'S LABORATORIES, INC.'S NOTICE
OF MOTION FOR PRELIMINARY INJUNCTION

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PLEASE TAKE NOTICE that on December 7, 2015, at 10:00 a.m., or as soon thereafter as counsel may be heard, before The Honorable Mary L. Cooper, United States District Judge, in her Honor's courtroom located at Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street Trenton, New Jersey 08608, Dr. Reddy's Laboratories, Inc. ("DRL") will move this Court, and hereby does move this Court, pursuant to Fed. R. Civ. P. 65(a), for a preliminary injunction, *inter alia*, enjoining AstraZeneca AB and AstraZeneca LP (collectively "AZ") from further prosecution of its action in the District of Delaware (Civil Action No. 1:15-cv-00988-SLR) pending a decision by this Court related to the enforcement of contractual obligations between the parties in which this Court has retained jurisdiction.

DRL previously brought an Emergency Motion For Order To Show Cause For Preliminary Injunction. (*See* Civ. Action No. 08-2496 (D.N.J.) Dkts.97, 100; Civ. Action No. 05-5553 (D.N.J.) Dkts.301, 303.) That motion was denied with leave granted to DRL to seek relief by Notice of Motion, relying upon the papers already of record and any additional papers as appropriate. (*See* Civ. Action No. 08-2496 (D.N.J.) Dkt.103; Civ. Action No. 05-5553 (D.N.J.) Dkt.307.) As such, DRL's present motion for a preliminary injunction is based on the facts set forth in its previously filed Notice of Motion, which is further supported and verified in the declaration of Aaron S. Eckenthal and in the accompanying brief in support thereof. DRL also submits herewith an additional Declaration of Aaron S. Eckenthal in an effort to supplement the record and apprise the Court of the recent memorandum and temporary restraining orders entered in the District of Delaware. (*See* Eckenthal Decl. ¶¶ 2-5, Exh. 1-4.)

DRL has given notice of this Notice of Motion via e-mail to counsel of record for AZ in this action and in the Delaware action referenced above.

WHEREBY, DRL seeks enforcement of the Settlement Agreement between it and AZ, and an order from this Court enjoining AZ from further prosecution of its suit in the District of Delaware pending further decisions by this Court in the enforcement of contractual obligations between the parties, and an order requiring AZ to seek dissolution of the TRO and/or other injunction as may be entered against DRL in the Delaware case.

Respectfully submitted,

LERNER, DAVID, LITTENBERG,
 KRUMHOLZ & MENTLIK, LLP
Attorneys for Defendant
 Dr. Reddy's Laboratories, Inc.

Dated: November 13, 2015   By: s/ William L. Mentlik
                                                    William L. Mentlik
                                                    Tel: 908.654.5000
                                                    E-mail:wmentlik@lernerdavid.com
                                                            litigation@lernerdavid.com

SO ORDERED:

Dated:_____   _____
          Trenton, New Jersey   Mary L. Cooper